

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CRYSTAL MCKINNEY,

Plaintiff,

-against-

SEAN COMBS a/k/a “P. DIDDY,” BAD BOY
ENTERTAINMENT LLC d/b/a BAD BOY
RECORDS, BAD BOY ENTERTAINMENT
HOLDINGS, INC., SEAN JOHN CLOTHING
LLC, and DADDY’S HOUSE RECORDINGS,
INC.,

Defendants.

No. 24-cv-3931

**DECLARATION OF
ERICA A. WOLFF
IN SUPPORT OF MOTION TO
DISMISS THE AMENDED
COMPLAINT**

ERICA WOLFF declares as follows:

1. I am a partner at the law firm Sher Tremonte LLP, counsel for Defendants Sean Combs, Bad Boy Entertainment LLC (named incorrectly as Bad Boy Entertainment LLC d/b/a Bad Boy Records), Bad Boy Entertainment Holdings, Inc., Sean John Clothing LLC, and Daddy’s House Recordings, Inc. (together, the “Combs Defendants”), in the above-captioned action. I have personal knowledge of the facts and circumstances set forth herein.

2. I submit this declaration in support of the Combs Defendants’ motion, pursuant to Fed. R. Civ. P. 12(b)(6), for an order: (a) dismissing all claims in the Amended Complaint, dated August 1, 2024 (ECF No. 19) against them with prejudice; and (b) granting such other and further relief as this Court deems just and proper.

3. Attached as **Exhibit A** is a copy of the Amended Complaint.

4. Attached as **Exhibit B** is a copy of an excerpt of the New York City Council’s Legislation Text for Introduction No. 1012-A, Local Law No. 2018/063, which provides, *inter alia*, the N.Y.C. Admin. Code § 10-1104, effective prior to January 9, 2022.

5. Attached as **Exhibit C** is a copy of the New York City Council's Legislation Text for Introduction No. 2372-B, Local Law No. 2022/021, which provides, *inter alia*, the N.Y.C. Admin. Code § 10-1104, effective as of January 9, 2022.

Dated: New York, New York
November 8, 2024

Erica A. Wolff
ERICA A. WOLFF